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F. #2022R00508

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. § 841(a)(1))

JONATAN “JONATHAN” SANTIAGO
and ESMERALDA VALLE,

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

MEGHAN AYERS, being duly sworn, deposes and states that she is a Postal Inspector with the United States Postal Inspection Service, currently assigned to the New York Division Contraband Interdiction and Investigations Team (“C12”), duly appointed according to law and acting as such.

On or about February 13, 2023, within the Eastern District of New York and elsewhere, the defendants JONATAN “JONATHAN” SANTIAGO (“SANTIAGO”) and ESMERALDA VALLE (“VALLE”) did knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Section 841(a)(1); Title 18, United States Code, Sections 2 and 3551 et seq.)

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I am a Postal Inspector with the United States Postal Inspection Service ("USPIS") and have been for approximately nine years. In that capacity, I have been involved in the investigation of numerous cases involving narcotics trafficking, specifically narcotics trafficking by use of the United States mails. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

2. C12, along with other law enforcement partners, has been investigating a narcotics trafficking operation wherein United States Postal Service ("USPS") packages containing cocaine are being shipped from various locations in Puerto Rico to New York and Connecticut. The cocaine is typically concealed in baby diapers and miscellaneous clothing items and all the packages seem to bear similar handwriting on the handwritten shipping labels. Multiple packages are usually sent at a time to one of several locations: 6034 55th Street #2L, Maspeth, NY 11378 (the "Santiago and Valle Home"), an address in New Britain, Connecticut, and one or more of multiple USPS post office boxes and other commercial mail receiving agency receptacles rented by the defendants in Brooklyn and Queens (the "Drop Locations"). The packages sent to the Santiago and Valle Home are usually addressed to names, which appear to be fake, other than those of the defendants. By contrast, the packages sent to the Drop Locations are usually addressed to one of the defendants.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

3. On or about February 13, 2023, a white United States Priority Mail Parcel, number 9505 5111 0381 3042 6528 81, which is approximately 12 inches by 14 inches by 3 inches and weighs approximately 4.75 pounds, arrived at the United States Post Office in Maspeth, Queens (“Parcel-1”). Parcel-1 bears the return address: “Norma Velez, Urb Corchado Calle, Trinitaria #276 Isabela, P.R. 00662” and the recipient address: “Keishla Velez, 6034 55th Street #2L, Maspeth, NY 11378.” A photograph of Parcel-1 is below:



4. A search of public and law enforcement databases found that the purported mailer, Norma Velez, is not associated with the listed return address and the purported recipient, Keishla Velez, is not associated with the listed recipient address. Based on my training and experience, I know that people engaged in narcotics transactions often use fictitious names to avoid detection by law enforcement.

5. Parcel-1 was identified as suspicious due to its size, weight, originating zip code, the purported mailer not being associated with the listed return address, the purported recipient not being associated with the listed recipient address and the history of such packages with what appears to be the same handwriting being sent to the Santiago and Valle Home and the Drop Locations. Specifically, approximately six such packages were interdicted between June 2, 2021 and November 28, 2022, searched pursuant to search warrants and found to contain

cocaine. Additionally, the handwritten shipping label on Parcel-1 appears to be written in the same handwriting as the prior interdicted packages that were found to contain cocaine.

6. Also on February 13, 2023, a second white United States Priority Mail Parcel, number 9505 5102 6124 3042 6506 97, which is approximately 12 inches by 14 inches by 3 inches and weighs approximately 4.625 pounds, bearing return address "Marilyn Santiago, Los Rotarios #19, Isabela, P.R. 00662", and addressed to "Esmeralda Valle, 4470 21st Street, Box #126, Long Island City, NY 11101" ("Parcel-2") arrived at the USPS Post Office in Long Island City, Queens. A photograph of Parcel-2 is below:



7. A search of public and law enforcement databases found that the purported mailer, Marilyn Santiago, is not associated with the listed return address.

8. Parcel-2 was identified as suspicious due to its size, weight, originating zip code, the purported mailer not being associated with the listed return address, VALLE being listed as the recipient, and the history of such packages addressed with what appears to be the same handwriting being sent to the Drop Locations being interdicted between June 2, 2021 and November 28, 2022, searched pursuant to search warrants and found to contain

cocaine. Additionally, the handwritten shipping label appears to be written in the same handwriting as the handwriting on Parcel-1 and on the interdicted packages referenced in paragraph five, above, that were found to contain cocaine.

9. On or about February 13, 2023, at approximately 1:00 p.m., Parcel-1 was delivered to that apartment building in which the Santiago and Valle Home is located and taken into the Santiago and Valle Home. Law enforcement observed SANTIAGO subsequently leaving the Santiago and Valle Home and driving to City Mailroom, a commercial mail receiving agency located at 4470 21st Street, in Long Island City, New York that rents the equivalent of Post Office boxes at which customers may receive packages from various commercial mail agencies including USPS, United Parcel Service, FedEx and DHL.

10. At approximately 6:30 p.m., law enforcement video recorded as SANTIAGO entered the mailbox store, obtained Parcel-2 that was sent from Puerto Rico to a mailbox rented by VALLE in January 2023 and bearing all the same features as Parcel-1, including the handwritten shipping label with handwriting that appears to be the same as that on previous shipments of cocaine. SANTIAGO returned to his vehicle with Parcel-2, then drove to pick up VALLE with Parcel-2 in his vehicle.

11. At approximately 7:00 p.m., law enforcement observed VALLE enter SANTIAGO's car. Once SANTIAGO picked up VALLE, law enforcement stopped the car with SANTIAGO, VALLE and Parcel-2 in it near 37-09 30th Avenue in Astoria, Queens. New York City Police Department Task Force Officer Katherine Gill, a certified narcotics detection canine handler, exposed Parcel-2 to her trained canine "Mulk" for exterior inspection and review. Mulk reacted to the package by barking and sitting down in front of it. Police Officer Gill informed me that the canine's reaction to the package indicated a

positive alert for the presence of controlled substances.²

12. SANTIAGO and VALLE thereafter both executed written consent forms authorizing law enforcement to search the Santiago and Valle Home. Inside the Santiago and Valle Home, law enforcement recovered Parcel-1. Police Officer Gill brought Mulk to conduct an exterior inspection of Parcel-1. Mulk reacted to the package by barking and sitting down in front of it, once again indicating a positive alert for the presence of controlled substances.

13. During the consent search of the Santiago and Valle Home, law enforcement additionally recovered an opened white envelope from the floor of a closet in the bedroom. That envelope contained a rectangular object wrapped in black tape, carbon paper, clear cling wrap and clear food saver. Inside the package was a white, powdery substance weighing approximately 1.1 kilograms, or approximately 2.4 pounds, that field tested positive for cocaine.

² Based on conversations with Officer Gill, I have learned that Mulk is a Dutch Shepherd who was originally certified as a narcotics-detection canine with the New York Police Training Council in or about May 2021. Mulk was certified to detect the odors of cocaine, crack-cocaine, methamphetamines, MDMA, heroin, and black tar heroin. Since then, Mulk has received significant additional training in narcotics detection, and has been regularly and successfully used by law enforcement to detect narcotics, including during the inspection of packages, suitcases, automobiles, and residences. Before Mulk was first certified, and during the training that he has received since then, he has been exposed to numerous different objects, some of which have contained narcotics, and others of which have not. Mulk has been trained to differentiate between those categories of objects, and to give his law enforcement handlers a positive indication (i.e., to “alert”) if he detects narcotics odors. Mulk has generally proven reliable in the field.

WHEREFORE, your deponent respectfully requests that the defendants JONATAN "JONATHAN" SANTIAGO and ESMERALDA VALLE be dealt with according to law.



MEGHAN AYERS
Postal Inspector
United States Postal Inspection Service

Sworn to before me this
14th day of February, 2023

[REDACTED]

THE HONORABLE PEGGY KUO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK